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Attorneys for Defendant

UNITED STATES DISTRICT COURT
DISTRICT OF OREGON
PORTLAND DIVISION

JAZMIN GRAFF, an individual,

No.: 3:23-cv-01370-MO

Plaintiff,

v.

OREGON HEALTH AND SCIENCE
UNIVERSITY, an independent public
corporation,

Defendant.

**DECLARATION OF SOPHIE SHADDY-
FARNSWORTH IN SUPPORT OF
DEFENDANT'S UNOPPOSED
MOTION FOR EXTENSION OF TIME
TO FILE ITS MOTION FOR AWARD
OF ATTORNEYS' FEES**

I, Sophie Shaddy-Farnsworth, do hereby declare and say:

1. I am an attorney licensed to practice law in the state of Oregon and one of the attorneys representing Defendant Oregon Health and Science University ("OHSU") in the above-captioned matter. I make this declaration based on my own personal knowledge. I make this declaration in support of Defendant's Motion for Extension of Time to File its Motion for Award of Attorneys' Fees.

2. OHSU requests an extension from April 23, 2025 to May 7, 2025 to file its Motion for Attorneys' Fees pursuant to the Court's Order on OHSU's Motion to Dismiss and for Sanctions (Dkts. 25 & 26.)

3. The parties are continuing to confer and work in good faith to come to an agreement regarding a reasonable fee amount and to limit motions practice before the Court to the extent possible. However, despite these efforts, additional time is needed to conclude conferral and to prepare a motion assessing OHSU's fees and expenses due to other conflicting deadlines and scheduling conflicts, including but not limited to nearly a dozen judicial settlement conferences counsel for the parties have scheduled in April 2025 involving other vaccine-related cases in this District. I am also scheduled to be out of the office for several days next week.

4. This motion is being made in good faith and not for the purposes of delay.

I declare under penalty of perjury under the laws of the United States that the foregoing is true and correct to the best of my knowledge.

DATED: April 18, 2025

s/ Sophie Shaddy-Farnsworth
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